

# **EXHIBIT 1**



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**Re: LA Waterkeeper v. Accurate Steel; Settlement**

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**From** William Carlon <william@carlonlaw.com>

**Date** Tue 6/17/2025 1:45 PM

**To** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

2 attachments (119 KB)

Carlon Declaration.docx; LA Waterkeeper v Accurate Steel, Stip to Continue Trial Dates.docx;

Ryan,

Further to my email from yesterday afternoon, I wanted to draw your attention to the Court's scheduling order (ECF No. 24). Fact discovery cut-off is September 12, 2025, which means that absent a continuance, Plaintiff will need to shift gears in the next week or so and begin immediately pursuing all of the discovery necessary to bring this case to trial.

Because I think we're close to an agreement, **Settlement Protected**

**Settlement protected** I'd like to avoid incurring the additional expense associated with pursuing discovery, and instead ask the Court for a continuance of 90 days. To that end, please see the attached stipulation and proposed order, and let me know if Accurate Steel agrees.

Thanks,  
Will

---

**From:** William Carlon <william@carlonlaw.com>

**Sent:** Monday, June 16, 2025 4:18 PM

**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Settlement protected**

**From:** William Carlon <william@carlonlaw.com>

**Sent:** Friday, June 13, 2025 9:18 AM

**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Subject:** Re: LA Waterkeeper v. Accurate Steel; Settlement

Thanks for the update, Ryan.

---

**From:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>

**Sent:** Friday, June 13, 2025 9:16 AM

**To:** William Carlon <william@carlonlaw.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Subject:** RE: LA Waterkeeper v. Accurate Steel; Settlement

Will,

**Settlement protected**

Thanks,

Ryan



**Ryan Matthews**

**Partner**

**Ryan.Matthews@lewisbrisbois.com**

**T: 916.646.8213 F: 916.564.5444**

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**From:** William Carlon <william@carlonlaw.com>

**Sent:** Friday, June 13, 2025 9:13 AM

**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Subject:** Re: LA Waterkeeper v. Accurate Steel; Settlement

EXTERNAL

Hi Ryan,

Just following up on my email from Monday.

Thanks,  
Will

---

**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>

**Sent:** Monday, June 9, 2025 2:00 PM

**To:** [ryan.matthews@lewisbrisbois.com](mailto:ryan.matthews@lewisbrisbois.com) <[ryan.matthews@lewisbrisbois.com](mailto:ryan.matthews@lewisbrisbois.com)>;  
[joe.salazar@lewisbrisbois.com](mailto:joe.salazar@lewisbrisbois.com) <[joe.salazar@lewisbrisbois.com](mailto:joe.salazar@lewisbrisbois.com)>;  
[alicia.crespo@lewisbrisbois.com](mailto:alicia.crespo@lewisbrisbois.com) <[alicia.crespo@lewisbrisbois.com](mailto:alicia.crespo@lewisbrisbois.com)>

**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>

**Subject:** LA Waterkeeper v. Accurate Steel; Settlement

Hi Ryan,

**Settlement protected**

Thanks,  
William Carlon  
Law Office of William Carlon  
437 Post Street  
Napa, CA 94559  
(530) 514-4115

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Outlook

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**Re: LA Waterkeeper v. Accurate Steel; Settlement**

---

**From** William Carlon <william@carlonlaw.com>**Date** Thu 6/19/2025 4:02 PM**To** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

Ryan,

Please provide your earliest available times for a meet and confer regarding Defendant's responses to Plaintiff's first set of discovery. I am available all day tomorrow, or Tuesday, June 24th.

Thank you,  
Will

---

**From:** William Carlon <william@carlonlaw.com>**Sent:** Tuesday, June 17, 2025 1:45 PM**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>**Subject:** Re: LA Waterkeeper v. Accurate Steel; Settlement

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**Settlement protected**

**Settlement protected** I'd like to avoid incurring the additional expense associated with pursuing discovery, and instead ask the Court for a continuance of 90 days. To that end, please see the attached stipulation and proposed order, and let me know if Accurate Steel agrees.

Thanks,  
Will

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Hi Ryan,

**Settlement protected**



Outlook

---

**Re: LA Waterkeeper v. Accurate Steel; Settlement**

---

**From** William Carlon <william@carlonlaw.com>

**Date** Tue 6/24/2025 12:38 PM

**To** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

Ryan,

May I have the courtesy of a response?

We would like to meet and confer to discuss three proposed times to submit to the Court for an informal discovery conference to address Defendant's outstanding responses to Plaintiff's first set of discovery.

I would also like to meet and confer to discuss the deposition of Accurate Steel pursuant to 30(b)(6). We intend to take the deposition remotely. The topics we would like to take Accurate Steel's deposition on include:

1. Defendant's methods, practices, and procedures regarding compliance with the storm water pollution control requirements of the Federal Water Pollution Control Act ("Clean Water Act"), 33 U.S.C. § 1342, et seq., and NPDES Permit No. CAS000001, State Water Resources Control Board Water Quality Order No. 14-57-DWQ (General Permit") at the Facility from 2019 through the present;
2. Any spills or discharges of hazardous or toxic substances on or around the Facility, from 2019 through the present, including but not limited to, correspondence to or from, and disclosures to, state or local agencies, notices of violation, and clean-up orders or plans;
3. Defendant's communications with the California Regional Water Quality Control Board regarding compliance or non-compliance with the Clean Water Act and/or the General Permit from 2019 through the present;
4. Defendant's methods, practices and procedures regarding the development, implementation and updating of all Storm Water Pollution Prevention Plans ("SWPPPs") for the Facility, from 2019 through the present;
5. The design, implementation, specific location at the Facility and the pollutant(s) intended to be addressed by the storm water best management practices ("BMPs") employed by Defendant from 2019 through the present;
6. Defendant's responses to storm water sampling reports that indicate exceedances of the Numeric Effluent Limitation and Numeric Action Level standards set forth in the General Permit;
7. Any toxic chemicals and other pollutants that are likely to be present in storm water discharges from the Facility, from 2019 through the present;
8. From 2019 through the present, the layout and/or design of the Facility's storm drain system and all drainage systems that contribute storm water and non-storm water thereto; and,
9. Any studies Defendant has conducted or had conducted for it regarding the geology, hydrology, hydrogeology and/or hydrochemistry of the Facility.

Thank you for your attention to this matter,  
Will

---

**From:** William Carlon <william@carlonlaw.com>

**Sent:** Thursday, June 19, 2025 4:02 PM

**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Subject:** Re: LA Waterkeeper v. Accurate Steel; Settlement



Outlook

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**Re: LA Waterkeeper v. Accurate Steel; Settlement**

---

**From** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>**Date** Tue 7/1/2025 6:45 AM**To** William Carlon <william@carlonlaw.com>**Cc** Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>; Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

Will,

Sorry I've been difficult to get ahold of. I had a trial last week, which I'm now out of. We are amenable to a stipulation continuing the trial dates. In the meantime, I know I owe you a few things, including Settlement protected some dates for an updated inspection, and an Settlement protected I'm pretty much wall to wall today, but should have some time tomorrow to get you updates those things in writing.

Thanks,

Ryan

**Ryan Matthews****Partner****Ryan.Matthews@lewisbrisbois.com****T: 916.646.8213 F: 916.564.5444**2020 West El Camino Avenue, Suite 700, Sacramento, CA 95833 | [LewisBrisbois.com](https://www.LewisBrisbois.com)**Representing clients from coast to coast. View our locations nationwide.**

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On Jun 30, 2025, at 7:29 PM, William Carlon &lt;william@carlonlaw.com&gt; wrote:

EXTERNAL

Ryan,

Since we have not heard from you, we will go ahead and ask the court for an informal discovery conference tomorrow. Again, I would love to not incur all the additional costs associated with



Outlook

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**Fw: Activity in Case 2:24-cv-07503-MWC-SSC Los Angeles Waterkeeper v. Accurate Steel Treating, Inc. Minutes of In Chambers Order/Directive - no proceeding held**

---

**From** William Carlon <william@carlonlaw.com>

**Date** Thu 7/3/2025 11:41 AM

**To** ryan.matthews@lewisbrisbois.com <Ryan.Matthews@lewisbrisbois.com>; joe.salazar@lewisbrisbois.com <joe.salazar@lewisbrisbois.com>; alicia.crespo@lewisbrisbois.com <alicia.crespo@lewisbrisbois.com>

Hi Ryan,

Seeing as how the court just denied our stipulation to extend trial dates, it looks like we're going to have to proceed with discovery alongside our settlement discussions. When can you get me a red line of the consent decree?

We should also set a call to discuss the outstanding discovery including the deposition topics and dates for a site inspection.

Thanks,  
Will

---

**From:** cacd\_ecfmail@cacd.uscourts.gov <cacd\_ecfmail@cacd.uscourts.gov>

**Sent:** Thursday, July 3, 2025 11:21:37 AM

**To:** ecfnef@cacd.uscourts.gov <ecfnef@cacd.uscourts.gov>

**Subject:** Activity in Case 2:24-cv-07503-MWC-SSC Los Angeles Waterkeeper v. Accurate Steel Treating, Inc. Minutes of In Chambers Order/Directive - no proceeding held

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**Notice of Electronic Filing**



The following transaction was entered on 7/3/2025 at 11:21 AM PDT and filed on 7/2/2025

**Case Name:** Los Angeles Waterkeeper v. Accurate Steel Treating, Inc.

**Case Number:** [2:24-cv-07503-MWC-SSC](#)

**Filer:**

**Document Number:** [27](#)

**Docket Text:**

**(IN CHAMBERS) ORDER REGARDING Extending Deadlines Set by the Court (Dkt. # [26]) by Judge Michelle Williams Court. Before the Court is a stipulation to extend the discovery cut-off date. Dkt. # 26. For lack of good cause, the Court DENIES the stipulation. IT IS SO ORDERED. (yl)**

**2:24-cv-07503-MWC-SSC Notice has been electronically mailed to:**

Joseph A Salazar alicia.crespo@lewisbrisbois.com, jsalazar@lbbslaw.com,  
joe.salazar@lewisbrisbois.com

Benjamin Avi Harris ben@lawaterkeeper.org

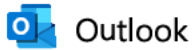
Barak Kamelgard barak@lawaterkeeper.org

William Nazar Carlon wncarlon@recap.email, william@carlonlaw.com

Ryan J Matthews ryan.matthews@lewisbrisbois.com, alicia.crespo@lewisbrisbois.com

Erina Kwon erina@lawaterkeeper.org

**2:24-cv-07503-MWC-SSC Notice has been delivered by First Class U. S. Mail or by other means  
BY THE FILER to :**



---

**LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery**

---

**From** William Carlon <william@carlonlaw.com>

**Date** Mon 7/7/2025 10:51 AM

**To** Matthews, Ryan <ryan.matthews@lewisbrisbois.com>; Salazar, Joe <joe.salazar@lewisbrisbois.com>; Crespo, Alicia <alicia.crespo@lewisbrisbois.com>

**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

 1 attachment (117 KB)

Salazar, L5\_250707.pdf;

Ryan,

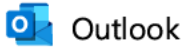
Please find attached my correspondence of today's date.

Thank you,

William Carlon  
Law Office of William Carlon  
437 Post Street  
Napa, CA 94559  
(530) 514-4115

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---

**Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery**

---

**From** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>

**Date** Tue 7/8/2025 7:53 PM

**To** William Carlon <william@carlonlaw.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

Will,

Three things on the discovery front. First, we are actively working on the RFA responses and hope to have something back to you early next week. Second, we are evaluating the PMQ notice with the client and will get back to you on personnel and scheduling. Third, we will get back to you on the inspection date.

As far as a meet and confer call, how is next Tuesday for you? I am hoping to have the RFAs to you by then.

Thanks,

Ryan



**Ryan Matthews**  
**Partner**  
**Ryan.Matthews@lewisbrisbois.com**

**T: 916.646.8213 F: 916.564.5444**

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On Jul 8, 2025, at 8:32 AM, Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com> wrote:

Will,

I will have substantive responses on the various correspondence from yesterday back to you today, likely early afternoon.

Thank you,

Ryan Matthews

---

**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>

**Sent:** Monday, July 7, 2025 2:23 PM

**To:** Matthews, Ryan <[Ryan.Matthews@lewisbrisbois.com](mailto:Ryan.Matthews@lewisbrisbois.com)>; Salazar, Joe <[Joe.Salazar@lewisbrisbois.com](mailto:Joe.Salazar@lewisbrisbois.com)>; Crespo, Alicia <[Alicia.Crespo@lewisbrisbois.com](mailto:Alicia.Crespo@lewisbrisbois.com)>

**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>

**Subject:** Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

EXTERNAL

Ryan,

Further to my letter from this morning, attached please find a courtesy copy of the Notice of Deposition served by USPS this afternoon. Again, because we have been unable to meet and confer as required by Rule 30(b)(6), we have gone ahead and noticed the deposition; however, we remain willing to discuss the topics as required, and to discuss the scheduling to try and accommodate everyone's busy calendars.

Thank you,  
Will Carlon

---

**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>

**Sent:** Monday, July 7, 2025 10:51 AM

**To:** Matthews, Ryan <[ryan.matthews@lewisbrisbois.com](mailto:ryan.matthews@lewisbrisbois.com)>; Salazar, Joe <[joe.salazar@lewisbrisbois.com](mailto:joe.salazar@lewisbrisbois.com)>; Crespo, Alicia <[alicia.crespo@lewisbrisbois.com](mailto:alicia.crespo@lewisbrisbois.com)>

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**Subject:** LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

Ryan,

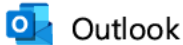
Please find attached my correspondence of today's date.

Thank you,

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**RE: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery**

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**Date** Tue 7/8/2025 8:32 AM  
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**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

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Thank you,

Ryan Matthews



**Ryan Matthews**  
**Partner**  
**Ryan.Matthews@lewisbrisbois.com**

**T: 916.646.8213 F: 916.564.5444**

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**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>  
**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>  
**Subject:** Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

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Will Carlon

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**To:** Matthews, Ryan <[ryan.matthews@lewisbrisbois.com](mailto:ryan.matthews@lewisbrisbois.com)>; Salazar, Joe <[joe.salazar@lewisbrisbois.com](mailto:joe.salazar@lewisbrisbois.com)>; Crespo, Alicia <[alicia.crespo@lewisbrisbois.com](mailto:alicia.crespo@lewisbrisbois.com)>

**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>

**Subject:** LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

Ryan,

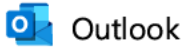
Please find attached my correspondence of today's date.

Thank you,

William Carlon  
Law Office of William Carlon  
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Napa, CA 94559  
(530) 514-4115

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---

**Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery**

---

**From** William Carlon <william@carlonlaw.com>

**Date** Thu 7/10/2025 2:36 PM

**To** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

 1 attachment (181 KB)

Salazar, L6\_250710.pdf;

Ryan,

In anticipation of our discussion tomorrow, please find attached a letter setting forth the specific concerns that Plaintiff has with Defendant's responses to the first set of interrogatories and requests for production of documents. We can use this as something of an agenda for tomorrow's call.

Thank you,  
Will

---

**From:** William Carlon <william@carlonlaw.com>

**Sent:** Thursday, July 10, 2025 10:39 AM

**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Subject:** Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

Yes, 12pm is fine. I'll send an invite.

---

**From:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>

**Sent:** Thursday, July 10, 2025 10:27:50 AM

**To:** William Carlon <william@carlonlaw.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Subject:** RE: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

Will,

I am free from 12-1:30 tomorrow. Will that window work for you?

Thanks,

Ryan



Ryan Matthews  
Partner  
Ryan.Matthews@lewisbrisbois.com  
T: 916.646.8213 F: 916.564.5444

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**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>  
**Sent:** Wednesday, July 9, 2025 8:09 AM  
**To:** Matthews, Ryan <[Ryan.Matthews@lewisbrisbois.com](mailto:Ryan.Matthews@lewisbrisbois.com)>; Salazar, Joe <[Joe.Salazar@lewisbrisbois.com](mailto:Joe.Salazar@lewisbrisbois.com)>; Crespo, Alicia <[Alicia.Crespo@lewisbrisbois.com](mailto:Alicia.Crespo@lewisbrisbois.com)>  
**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>  
**Subject:** Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

EXTERNAL

Ryan,

I am out next week. We have been trying to meet and confer with you on the discovery issues since June 19th, to no avail. I don't think we need to chat long, the responses to Plaintiff's first set of discovery were, by your own admission, somewhat of a placeholder. Please make time for a meet and confer this week, as requested. It shouldn't take more than half an hour.

As far as the PMQ deposition goes, we would like to schedule it for the last week of July. I will provide a revised notice with that information updated. Please let me know if there is a day that week that works better for you and your team.

Thank you for your attention to this matter,  
Will

---

**From:** Matthews, Ryan <[Ryan.Matthews@lewisbrisbois.com](mailto:Ryan.Matthews@lewisbrisbois.com)>  
**Sent:** Tuesday, July 8, 2025 7:52 PM  
**To:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>; Salazar, Joe <[Joe.Salazar@lewisbrisbois.com](mailto:Joe.Salazar@lewisbrisbois.com)>; Crespo, Alicia <[Alicia.Crespo@lewisbrisbois.com](mailto:Alicia.Crespo@lewisbrisbois.com)>  
**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>  
**Subject:** Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

Will,

Three things on the discovery front. First, we are actively working on the RFA responses and hope to have something back to you early next week. Second, we are evaluating the PMQ notice with the client and will get back to you on personnel and scheduling. Third, we will get back to you on the inspection date.



As far as a meet and confer call, how is next Tuesday for you? I am hoping to have the RFAs to you by then.

Thanks,

Ryan



**Ryan Matthews**  
**Partner**

[Ryan.Matthews@lewisbrisbois.com](mailto:Ryan.Matthews@lewisbrisbois.com)

**T: 916.646.8213 F: 916.564.5444**

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On Jul 8, 2025, at 8:32 AM, Matthews, Ryan <[Ryan.Matthews@lewisbrisbois.com](mailto:Ryan.Matthews@lewisbrisbois.com)> wrote:

Will,

I will have substantive responses on the various correspondence from yesterday back to you today, likely early afternoon.

Thank you,

Ryan Matthews

---

**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>

**Sent:** Monday, July 7, 2025 2:23 PM

**To:** Matthews, Ryan <[Ryan.Matthews@lewisbrisbois.com](mailto:Ryan.Matthews@lewisbrisbois.com)>; Salazar, Joe <[Joe.Salazar@lewisbrisbois.com](mailto:Joe.Salazar@lewisbrisbois.com)>; Crespo, Alicia <[Alicia.Crespo@lewisbrisbois.com](mailto:Alicia.Crespo@lewisbrisbois.com)>

**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>

**Subject:** Re: LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

EXTERNAL

Ryan,

Further to my letter from this morning, attached please find a courtesy copy of the Notice of Deposition served by USPS this afternoon. Again, because we have been unable to meet and confer as required by Rule 30(b)(6), we have gone ahead and noticed the deposition; however, we remain willing to discuss the topics as required, and to discuss the scheduling to try and accommodate everyone's busy calendars.

Thank you,

Will Carlon

---

**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>

**Sent:** Monday, July 7, 2025 10:51 AM

**To:** Matthews, Ryan <[ryan.matthews@lewisbrisbois.com](mailto:ryan.matthews@lewisbrisbois.com)>; Salazar, Joe <[joe.salazar@lewisbrisbois.com](mailto:joe.salazar@lewisbrisbois.com)>; Crespo, Alicia <[alicia.crespo@lewisbrisbois.com](mailto:alicia.crespo@lewisbrisbois.com)>

**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>

**Subject:** LA Waterkeeper v. Accurate Steel; Request to Meet and Confer re Discovery

Ryan,

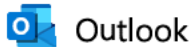
Please find attached my correspondence of today's date.

Thank you,

William Carlon  
Law Office of William Carlon  
437 Post Street  
Napa, CA 94559  
(530) 514-4115

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Outlook

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**LA Waterkeeper v. Accurate Steel; Request for Production of Documents**

---

**From** William Carlon <william@carlonlaw.com>

**Date** Mon 8/4/2025 12:10 PM

**To** Matthews, Ryan <ryan.matthews@lewisbrisbois.com>; Salazar, Joe <joe.salazar@lewisbrisbois.com>; Crespo, Alicia <alicia.crespo@lewisbrisbois.com>

**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

Ryan,

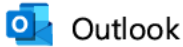
We received Defendant's amended responses to Plaintiff's first set of discovery on Friday. I did not see an amended response to Plaintiff's Request for Production of Documents, as required by the Court's order, and the documents that were produced appear to be an incomplete response to the requests made by Plaintiff. In our previous meet and confer efforts, you had represented that Defendant was going to produce responsive financial documents and that you were going to give us a proposed protective order (you also made this representation to Magistrate Judge Christensen during our informal discovery conference). No proposed protective order was produced, and no financial documents were produced.

Are you available to meet on this today or tomorrow? With the close of discovery approaching, we need to resolve this dispute quickly. Please also provide at least three dates this week that you are available for an informal discovery conference with the Magistrate Judge.

Thank you,  
William Carlon  
Law Office of William Carlon  
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Napa, CA 94559  
(530) 514-4115

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---

**RE: LA Waterkeeper v. Accurate Steel; Request for Production of Documents**

---

**From** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>  
**Date** Tue 8/5/2025 5:03 PM  
**To** William Carlon <william@carlonlaw.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>  
**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

 1 attachment (62 KB)

LA Waterkeeper v. Accurate Steel - Stipulated Protective Order(161062812.1).docx;

Will,

I thought the protective order had already been transmitted to you. My mistake. It's attached. For the rest, I'd ask you to give me until noon tomorrow.

Thanks,

Ryan



**Ryan Matthews**  
**Partner**  
**Ryan.Matthews@lewisbrisbois.com**

**T: 916.646.8213 F: 916.564.5444**

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---

**From:** William Carlon <william@carlonlaw.com>  
**Sent:** Tuesday, August 5, 2025 11:39 AM  
**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>  
**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>  
**Subject:** Re: LA Waterkeeper v. Accurate Steel; Request for Production of Documents

EXTERNAL

Ryan,

In addition to providing amended responses to all of the first set of written discovery, the Court's order, ECF No. 30, required the outstanding 30(b)(6) deposition to occur no later than August 8, 2025, unless otherwise agreed to by the parties in writing. We have not received any indication that Defendant intends to comply with this part of the order.

Please provide your side's availability to conduct the 30(b)(6) deposition between August 12<sup>th</sup> and August 15th. If I don't hear back from you by the end of the day, we will seek appropriate relief from the court.

Thank you,  
Will Carlon

---

**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>

**Sent:** Monday, August 4, 2025 12:10 PM

**To:** Matthews, Ryan <[ryan.matthews@lewisbrisbois.com](mailto:ryan.matthews@lewisbrisbois.com)>; Salazar, Joe <[joe.salazar@lewisbrisbois.com](mailto:joe.salazar@lewisbrisbois.com)>; Crespo, Alicia <[alicia.crespo@lewisbrisbois.com](mailto:alicia.crespo@lewisbrisbois.com)>

**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>

**Subject:** LA Waterkeeper v. Accurate Steel; Request for Production of Documents

Ryan,

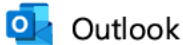
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Are you available to meet on this today or tomorrow? With the close of discovery approaching, we need to resolve this dispute quickly. Please also provide at least three dates this week that you are available for an informal discovery conference with the Magistrate Judge.

Thank you,  
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(530) 514-4115

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---

**Re: LA Waterkeeper v. Accurate Steel; Request for Production of Documents**

---

**From** William Carlon <william@carlonlaw.com>

**Date** Wed 8/6/2025 11:31 AM

**To** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

Ryan,

The stipulated protective order looks fine, except Barak is no longer with LA Waterkeeper and should be removed from the title page. With that edit, you have my authority to file.

Thanks,  
Will

---

**From:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>

**Sent:** Tuesday, August 5, 2025 5:03 PM

**To:** William Carlon <william@carlonlaw.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

**Cc:** Erina Kwon <erina@lawwaterkeeper.org>; Ben Harris <ben@lawwaterkeeper.org>

**Subject:** RE: LA Waterkeeper v. Accurate Steel; Request for Production of Documents

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Ryan



**Ryan Matthews**

**Partner**

**Ryan.Matthews@lewisbrisbois.com**

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**Sent:** Tuesday, August 5, 2025 11:39 AM

**To:** Matthews, Ryan <Ryan.Matthews@lewisbrisbois.com>; Salazar, Joe <Joe.Salazar@lewisbrisbois.com>; Crespo, Alicia <Alicia.Crespo@lewisbrisbois.com>

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Will Carlon

---

**From:** William Carlon <[william@carlonlaw.com](mailto:william@carlonlaw.com)>

**Sent:** Monday, August 4, 2025 12:10 PM

**To:** Matthews, Ryan <[ryan.matthews@lewisbrisbois.com](mailto:ryan.matthews@lewisbrisbois.com)>; Salazar, Joe <[joe.salazar@lewisbrisbois.com](mailto:joe.salazar@lewisbrisbois.com)>; Crespo, Alicia <[alicia.crespo@lewisbrisbois.com](mailto:alicia.crespo@lewisbrisbois.com)>

**Cc:** Erina Kwon <[erina@lawwaterkeeper.org](mailto:erina@lawwaterkeeper.org)>; Ben Harris <[ben@lawwaterkeeper.org](mailto:ben@lawwaterkeeper.org)>

**Subject:** LA Waterkeeper v. Accurate Steel; Request for Production of Documents

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